

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Lyndell Bell Rd Drum - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region IV

Subject: POLREP #3
 Bulking Completed
 Lyndell Bell Rd Drum
 Manchester, TN
 Latitude: 35.4767700 Longitude: -86.1846660

To: Jim Webster, USEPA R4 ERRB
 Andy Binford, TDEC

From: Steve Spurlin, On Scene Coordinator

Date: 4/4/2014

Reporting Period: 4/3/2014 - 4/5/2014

1. Introduction

1.1 Background

Site Number:	B43F	Contract Number:	
D.O. Number:		Action Memo Date:	4/3/2014
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	3/27/2014	Start Date:	3/27/2014
Demob Date:		Completion Date:	
CERCLIS ID:	TNN000400644	RCRIS ID:	
ERNS No.:	1077950	State Notification:	03/27/2014
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency

1.1.2 Site Description

The Site consists of a drum reconditioner who sells a variety of plastic drums, metal drums, and various other containers.

1.1.2.1 Location

420 Lyndell Bell Rd, Manchester, TN

1.1.2.2 Description of Threat

A site investigation was conducted, and Tennessee Department of Environment & Conservation (TDEC) and EPA personnel observed numerous drums in poor condition, improperly stored, and leaking oils, corrosives, and possibly solvents.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On March 19, 2014 Tennessee Department of Environmental Conservation investigated a complaint at 420 Lyndell Bell Road in Coffee County. The complaint stated that demolition waste from a house in Manchester had been disposed at this location. There is a business on this property that sells a variety of plastic drums, buckets, and containers as well as metal drums. On March 26, 2013 while investigating the complaint regarding the demolition waste, TDEC personnel observed a "pit" that was being used to drain 55-gallon drums. There was a grate placed across the pit to facilitate this dumping. While it appeared that these particular drums contained some sort of food related waste, there were also a large number of other drums nearby that had a petroleum odor. There were numerous drums with flammable labels and the odor of solvents and petroleum was detected throughout the site. On March 27, 2014, OSC Steve Spurlin conducted a site investigation and observed numerous drums in poor condition leaking oils, corrosives, and possibly solvents. OSC Spurlin initiated an emergency response action to address the drums and spilled materials.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On March 27, 2014, OSC Steve Spurlin conducted a site investigation and observed numerous drums in poor conditions leaking oils, corrosives, and possibly solvents. OSC Spurlin initiated an emergency response action to address the drums and spilled materials. ERRS WRS/USES and START TTEM mobilized to the site on March 27, 2014 to retrieve/stage drums from multiple site areas; excavate and stockpile grossly contaminated soil areas; pump unknown liquids from the open soil pit; and collect samples to identify waste materials.

To date approximately 3100 containers ranging from 5 to 55 gallons have been identified on site. Oils, corrosives, paints, resins, solvents, flammables, and oxidizers have been noted throughout the site. Incompatible chemicals are typically being stored together. A second "dumping area" has been identified near the original pit. The dumping area was suspected due to drums nearby and stained and discolored soils. This area was excavated and stockpiled revealing a green discoloration in the soil. Strong odors were emitted from the excavation and air monitoring results indicated VOC concentrations at approximately 20 ppm.

2.1.2 Response Actions to Date

The site has been divided into 5 geographic areas to focus operations.

Area 1 is adjacent to the house on the north side of the property. Food grade solid waste drums as well as numerous drums containing hazardous substances and oil are staged here. Hazcatting has been completed and all wastes have been bulked and staged for disposal. The property owner has secured a local contractor to address the food grade wastes.

Area 2 is to the West and behind Area 1. All drums in this area have been moved to area 1, classified and bulked. 51 five gallon Lacquer containers were identified as mostly full, palletized and staged for disposal as flammable liquids in Area 1.

On 4/05/2014 OSC Ball and START prepped and conducted a 2.5 hour fully encapsulated Level B entry to address 41 drums of hydroperfluoroheptinol chloride drums. hydroperfluoroheptinol chloride produces hydrochloric acid and organic acid clouds when reacted with water and can produce hydrofluoric acid clouds when burned.

Due to the deteriorated condition and compromised integrity of the drums and the nature of the product inside, the drums were slated for disposal. The entry consisted of pouring out residual product and then triple rinsing the poly lined steel drums with water, baking soda solution, and water again. Once rinsed a representative sample of the rinsate was sampled to verify a neutral pH and the drums were crushed. The residual product and rinse water will likely be disposed of as an organic acid pending waste sample results. Decontamination of the entry team was done by spraying a baking soda solution on each

member and then rinsing with water. Decontamination water was bulked with the drum rinsate.

Area 3 includes a number of out buildings including a workshop behind the house. All drums in this area have been sorted and bulked into totes. Most of these drums were acids, bases or neutral liquids. Empty containers were left in place. All bulked totes were staged in Area 1 for disposal.

Area 4 (commonly referred to as the poly area) is adjacent to the house on the south side of the property. Hundreds of poly drums and buckets exist here with various amounts of liquid hazardous substances in them. Oxidizers, acids, bases neutral liquids and food grade wastes existed in this area. All hazardous substances have been bulked for disposal and relocated to Area 1. All food grade wastes will be addressed by the property owner's contractor.

Area 5 is on the west side of the property (in the back). This area is where over 100 metal drums with unknown contents were stored. A disposal pit was located in this area as well as a suspected dumping area. 16 additional drums were identified in this area during a TDEC walk through. These drums were identified as paint waste, bulked and staged in Area 1 for disposal. Soil samples from the excavations in this area showed no results above EPA Removal Management Levels (RMLs); therefore, EPA excavation activities are complete. All drums and totes that have been bulked from this area have been staged in Area 1 for disposal. A crushed drum pile is located in this area and will be addressed during disposal activities. The two excavations will be filled during disposal activities.

Environmental Media Sampling:

START completed environmental sampling on 04/02/2014 including 5 composite soil samples, 2 run off liquid samples, 4 sediment samples, 5 surface water samples and 2 excavation confirmation samples. 3 intermittent streams flow from the site into Davidson Branch and all were assessed for impacts.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Mark Bell - Drum recycler and property owner

Mr. Bell has provided written access and has been issued a NOFI and NOFA.

Drum labels:

Nashville Chemical and equipment company

Purity Dairies

Cosmo Lab Inc.

General Mills-Yoplait

Nestle Waters North America

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Soils					
Liquids					
Crushed drums					

2.2 Planning Section

2.2.1 Anticipated Activities

Area 1 Disposal of bulked liquid wastes.

Area 2 Completed bulking operations.

Area 3 Completed bulking operations.

Area 4 Completed bulking operations.

Area 5 Disposal of soil piles, crushed empty drums, and waste material in drums.

2.2.1.1 Planned Response Activities

Collect waste disposal samples
Disposal operations loadout
Restoration

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$75,000.00	\$52,000.00	\$23,000.00	30.67%
TAT/START	\$70,000.00	\$50,000.00	\$20,000.00	28.57%
Intramural Costs				
Total Site Costs	\$145,000.00	\$102,000.00	\$43,000.00	29.66%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

EPA
TDEC

3.2 Cooperating Agencies

Coffee County EMA
Coffee County Sherriff

4. Personnel On Site

EPA OSC
START TTEMI - 3
ERRS USES - 4

5. Definition of Terms

EPA - Environmental Protection Agency
OSC - On- Scene Coordinator
TDEC - Tennessee Department of Environmental Control
NCP - National Oil and Hazardous Substances Pollution Contingency Plan
NRC - National Response Center
CFR - Code of Federal Regulations
RP - Responsible Party
NOFI - Notice of Federal Interest
NOFA - Notice of Federal Assumption
EMA - Emergency Management Agency
START - Superfund Technical Assessment and Response Team
ERRS - Emergency and Rapid Response Services

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.